

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

THE CITY OF HUNTINGTON,

Plaintiff,

v.

Civil Action No. 3:17-01362

Hon. David A. Faber

AMERISOURCEBERGEN DRUG
CORPORATION, et al.

Defendants.

CABELL COUNTY COMMISSION,

Plaintiff,

v.

Civil Action No. 3:17-01665

Hon. David A. Faber

AMERISOURCEBERGEN DRUG
CORPORATION, et al.

Defendants.

**AMENDED NOTICE OF REMOTE 30(b)(6) DEPOSITION OF
AMERICAN OSTEOPATHIC ASSOCIATION**

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure and the Deposition Protocol governing this litigation, Defendant Cardinal Health, Inc., by and through counsel, hereby give notice that the remote, oral videotaped depositions will be taken of the following agents of the American Osteopathic Association:

- Melissa Schmidt, Director, Journal of the American Osteopathic Association, beginning at 4:00 p.m. (EST) on Monday, August 24, 2020;
- Dave Pugach, Sr. Vice President, Public Policy, beginning at 9:00 a.m. EST) on Tuesday, August 25, 2020; and
- Chaunessie Baggett, Certifying Board Services, Assistant Vice President, Policy,

beginning at 2:00 p.m. (EST) on Tuesday, August 25, 2020

The depositions shall be videotaped and recorded stenographically and will be conducted before a notary public or other person authorized to administer oaths. The oral examinations are to be taken for the purposes of discovery, for use at trial, or for such other purposes as are permitted under the Federal Rules of Civil Procedure, the local rules of the United States District Court for the Southern District of West Virginia, and the Deposition Protocol. Court reporting services and video recording services will be provided by Veritext Legal Solutions (216-523-1313; opioid@veritext.com), who will provide remote access for all parties wishing to participate via video conference or telephone.

PLEASE TAKE FURTHER NOTICE that the Deponents must have access to laptops, computers, or tablets with web camera capability. Deponents may not use a cell phone to provide testimony. Deponents must also have the capability to view documents electronically. To the extent Deponents are not in possession of the required technology, documents shall be provided to the Deponents in hard copy and/or Deponents' counsel shall provide the required technology. Recommended Specifications are below:

- i. Computer
- ii. Web Camera
- iii. Internet Browser (Google Chrome Preferred)
- iv. Minimum 10 mb/s wired, secure internet connection

At minimum, Deponents must have sufficient internet connectivity and bandwidth to support a video deposition. Such capacity shall be sufficient to ensure that when used with the system selected for the deposition, there shall be (a) high-quality video upload (from Deponents) and download (to other Participants), (b) no material time discrepancy between audio and video, and (c) consistent connectivity, with no material disruptions.

Dated: August 21, 2020

Respectfully submitted,

/s/ Steven R. Ruby

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 21st day of August, 2020, the foregoing “Amended Notice of Remote 30(b)(6) Deposition of American Osteopathic Association” was served using the Court’s CM/ECF system, which will send notification of such filing to all counsel of record, and via electronic mail to mdl2804discovery@motleyrice.com and track2opioddefendants@reedsmith.com.

Dated: August 21, 2020

/s/ Steven R. Ruby
Steven R. Ruby (WVSB No. 10752)